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 Global LLC, Winston Fisher, Fisher Brothers Management
 Co. LLC, Fisher Brothers Financial and Development
 Company LLC*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

GEORGE JARAMILLO, II, an individual,
Plaintiff,

v.

AREA 15 LAS VEGAS LLC, a Delaware
 Limited Liability Company, AREA 15
 GLOBAL LLC, a Delaware Limited
 Liability Company, ARNOLD FISHER, an
 Individual, KENNETH FISHER, an
 Individual, STEVEN FISHER, an
 Individual, WINSTON FISHER, an
 Individual, FISHER BROTHERS
 MANAGEMENT CO. LLC, a New York
 Limited Liability Company, FISHER
 BROTHERS FINANCIAL AND
 DEVELOPMENT COMPANY LLC, a
 New York Limited Liability Company, and
 DOES 1-50 Inclusive,

Defendant.

CASE NO.: 2:21-cv-00891-RFB-BNW

**STIPULATION AND ORDER TO EXTEND
 DISCOVERY AND DISPOSITIVE MOTION
 DEADLINES**

(FIRST REQUEST)

Plaintiff GEORGE JARAMILLO, II (“**Plaintiff**”), by and through his undersigned counsel
 of record, the law firms of Brown, Clark, Le, Ames, Stedman & Cevallos LLP and Kaplan Cottner,
 and Defendants AREA 15 LAS VEGAS LLC (“**Area 15 LV**”), AREA 15 GLOBAL LLC (“**Area**

1 **15 Global**") (together with Area 15 LV, the "**Area 15 Entities**"), WINSTON FISHER
 2 ("**Winston**"), FISHER BROTHERS MANAGEMENT CO. LLC ("**FBMC**"), and FISHER
 3 BROTHERS FINANCIAL AND DEVELOPMENT COMPANY LLC ("**FFDC**") (together with
 4 FBMC, the "**Fisher Entities**") (collectively, the "**Defendants**"), by and through their undersigned
 5 counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby stipulate to extend
 6 the discovery and dispositive motion deadlines in the Scheduling Order (ECF 54), as set forth
 7 below:

8 1. On May 6, 2021, Plaintiff filed his Complaint in this Court against Defendants. *See*
 9 *generally* ECF 1.

10 2. At a hearing on Defendants' Motion to Dismiss for Failure to State a Claim (ECF
 11 22), this Court dismissed some of Plaintiff's claims but permitted Plaintiff to conduct jurisdictional
 12 and discovery and to file an amended Complaint by April 25, 2022. ECF 49; 50.

13 3. On May 3, 2022, this Court extended the deadline for Plaintiff to file an amended
 14 Complaint to June 27, 2022. ECF 66.

15 4. Pursuant to the Scheduling Order, the current close of discovery is July 25, 2022.
 16 ECF 54.

17 5. On June 27, 2022, Plaintiff filed an Amended Complaint, adding previously
 18 dismissed claims and defendants back into the instant case.

19 6. The following is a list of discovery completed by the parties to date:

- 20 a. On October 13, 2021, Plaintiff served his Initial Disclosure Statement.
- 21 b. On February 4, 2022, the parties engaged in a FRCP 26(f) conference.
- 22 c. On February 4, 2022, Plaintiff served Demands for Production of
 23 Documents on the Area 15 Entities and the Fisher Entities.
- 24 d. On February 4, 2022, Plaintiff served his First Sets of Interrogatories on
 25 then-dismissed Steven, Arnold, and Kenneth.
- 26 e. On February 9, 2022, Plaintiff served a Demand for Production of
 27 Documents and Interrogatories on Winston.

- f. On February 9, 2022, Defendants circulated a draft ESI Protocol and Stipulated Protective Order for Plaintiff's review and comment.
- g. On February 14, 2022, the parties engaged in a continued FRCP 26(f) conference.
- h. On February 18, 2022, Defendants served their Initial Disclosure Statement.
- i. On February 28, 2022, the parties engaged in a meet and confer telephonic conference with respect to the Demands for Production of Documents served on Defendants, at which the parties reached several agreements as to, among other things, the document demands and interrogatories to narrow the responses.
- j. On March 4, 2022, Plaintiff agreed to the form of the Stipulated Protective Order.
- k. On March 8, 2022, this Court entered the Stipulated Confidentiality Agreement and Protective Order. ECF 57.
- l. On March 15, 2022, Defendants served their First Supplemental Disclosure Statement.
- m. On March 21, 2022, Plaintiff served Interrogatories to Area 15 Global.
- n. On March 21, 2022, Plaintiff served a Second Set of Interrogatories to Area 15 LV.
- o. On March 21, 2022, Plaintiff served a Second Set of Interrogatories to FFDC.
- p. On March 21, 2022, Plaintiff served a Second Set of Interrogatories to FBMC.
- q. On March 25, 2022, Defendants served their Second Supplemental Disclosure Statement.
- r. On March 30, 2022, Area 15 Global served its Response to Plaintiff's First Set of Requests for Production.

- s. On March 30, 2022, Area 15 LV served its Response to Plaintiff's First Set of Requests for Production.
- t. On March 30, 2022, Defendants served their Third Supplemental Disclosure Statement.
- u. On March 31, 2022, FFDC served its Responses to Plaintiff's First Set of Requests for Production.
- v. On March 31, 2022, Winston served his Responses to Plaintiff's First Set of Requests for Production of Documents.
- w. On April 12, 2022, Area 15 Global served its Responses to Plaintiff's Second Set of Interrogatories.
- x. On April 12, 2022, Area 15 LV served its Responses to Plaintiff's Second Set of Interrogatories.
- y. On April 15, 2022, Area 15 Global served its Privilege Log.
- z. On April 15, 2022, Area 15 LV served its Privilege Log.
- aa. On April 20, 2022, FBMC served its Responses to Plaintiff's Second Set of Interrogatories.
- bb. On April 20, 2022, Winston served his Responses to Plaintiff's First Set of Interrogatories.
- cc. On April 20, 2022, FFDC served its Responses to Plaintiff's Second Set of Interrogatories.
- dd. On April 27, 2022, Area 15 Global served its First Supplemental Responses to Plaintiff's Second Set of Interrogatories.
- ee. On April 27, 2022, Area 15 Global served its First Supplemental Responses to Plaintiff's First Set of Requests for Production.
- ff. On April 27, 2022, Area 15 LV served its First Supplemental Responses to Plaintiff's First Set of Requests for Production.
- gg. On April 27, 2022, Defendant FBMC served its Privilege Log.

- hh. On April 27, 2022, Defendants served their Fourth Supplemental Disclosure Statement.
- ii. On April 27, 2022, Defendant FBMC served its First Supplemental Responses to Plaintiff's First Set of Requests for Production.
- jj. On April 27, 2022, Defendant FFDC served its First Supplemental Responses to Plaintiff's First Set of Requests for Production.
- kk. On April 27, 2022, Defendant FFDC served its First Supplemental Responses to Plaintiff's First Set of Interrogatories.
- ll. On April 27, 2022, Winston served his First Supplemental Responses to Plaintiff's First Set of Interrogatories.
- mm. On April 27, 2022, Winston served his First Supplemental Responses to Plaintiff's First Set of Requests for Production.
- nn. On May 20, 2022, Defendants served their Fifth Supplemental Disclosure Statement.
- oo. On May 24, 2022, Defendant FBMC served its First Supplemental Privilege Log.

7. The following is a list of discovery Defendants believe is remaining and necessary to complete:

- a. Depositions of parties and party representatives;
- b. Written discovery to Plaintiff on all of the claims and allegations in his Amended Complaint, including FRCP 33 interrogatories, FRCP 34 requests for production, and FRCP 36 requests for admission;
- c. Numerous FRCP 45 document subpoenas to third parties with relevant knowledge of Plaintiff's claims, allegations, and damages;
- d. Third party depositions; and
- e. Preparation of supplemental responses to Plaintiff's prior written discovery to Defendants and supplemental disclosure statements, as necessary.

1 8. The following is a list of discovery Plaintiff believes is remaining and necessary to
2 complete:

- 3 a. Depositions of individual defendants and LLC party representatives;
4 b. FRCP 45 document subpoenas to third parties with relevant knowledge of
5 Plaintiff's claims, and allegations; and
6 c. Third party depositions.

7 9. The parties have not completed the foregoing discovery to date because the
8 Amended Complaint was filed less than one week ago, on June 27, 2022, and the foregoing
9 discovery is necessary as to all of the claims and allegations in that Amended Complaint.

10 10. Given the proximity of the deadline for Plaintiff to file his Amended Complaint to
11 the current close of discovery (less than 30 days' time), there is good cause to extend the discovery
12 and dispositive motion deadlines.

13 11. The instant request is timely, as it was submitted no later than 21 days from the
14 current close of discovery.

15 12. This is the parties' first request to extend the discovery and dispositive motion
16 deadlines set forth in the Scheduling Order.

17 13. The parties make the instant request in good faith and without any intent to delay
18 these proceedings.

19 14. Based on the foregoing, Plaintiff and Defendants stipulate that the discovery
20 deadline be extended to September 30, 2022, and the dispositive motion deadline to October 31,
21 2022.

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23
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25
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27 [SIGNATURE PAGE FOLLOWS]
28

1 DATED 1st of July, 2022.

2 BROWNSTEIN HYATT FARBER SCHRECK, LLP

KAPLAN COTTNER

3 BY: /s/ Travis F. Chance

BY: /s/ Ed Brown

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8 *Area 15 Global LLC, Winston Fisher, Fisher Brothers*
9 *Management Co. LLC, Fisher Brothers Financial and*
10 *Development Company LLC*

Attorneys for Plaintiff George
Jaramillo, II

11 IT IS SO ORDERED.

12 

13 UNITED STATES DISTRICT/MAGISTRATE JUDGE

14 Dated 7/5/2022